IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SOPHIA HARTLEY, individually and on behalf of all others similarly situated,

Plaintiff,

v. No. 1:22-cv-05891

UNIVERSITY OF CHICAGO MEDICAL CENTER and META PLATFORMS, INC.,

Defendants.

<u>DEFENDANT UNIVERSITY OF CHICAGO MEDICAL CENTER'S</u> <u>MOTION TO DISMISS</u>

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant University of Chicago Medical Center ("UCMC") moves to dismiss Counts I, IV, and V of the Class Action Complaint filed by Plaintiff Sophia Hartley. In support hereof, UCMC is contemporaneously filing a supporting Memorandum of Law.

WHEREFORE, UCMC respectfully requests the Court grant this motion and enter an order dismissing Counts I, IV, and V of the Class Action Complaint with prejudice and granting such other relief as the Court deems appropriate.

Respectfully submitted,

UNIVERSITY OF CHICAGO MEDICAL CENTER

By: s/ Joseph A. Strubbe

One of Its Attorneys

Joseph A. Strubbe Chad A. Schiefelbein Zachary J. Watters Vedder Price P.C. 222 North LaSalle Street Chicago, Illinois 60601 T: +1 312 609 7500

Dated: February 6, 2023

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **DEFENDANT UNIVERSITY**

OF CHICAGO MEDICAL CENTER'S MOTION TO DISMISS with the Clerk of the Court

using the CM/ECF system which will send notification of such filing to the following:

Ryan F. Stephan James B. Zouras Mohammed A. Rathur STEPHAN ZOURAS, LLP 100 N. Riverside Plaza, Suite 2150 Chicago, Illinois 60606

Phone: (312)233-1550 Fax: (312)233-1560

rstephan@stephanzouras.com jzouras@stephanzouras.com mrathur@stephanzouras.com

Matthew L. Kutcher Cooley LLP 110 N. Wacker Drive Suite 4200 Chicago, IL 60606 Phone: (312) 881-6500

Fax: (312) 881-6598 mkutcher@cooley.com

on February 6, 2023

Lauren R. Goldman Gibson, Dunn & Crutcher LLP 200 Park Avenue New York, NY 10166-0193 Phone: (212) 351-4000

lgoldman@gibsondunn.com

/s/ Joseph A. Strubbe

Joseph A. Strubbe